

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ADVANCED CLUSTER SYSTEMS, INC.,

Plaintiff,

v.

NVIDIA CORPORATION, NVIDIA
SINGAPORE PTE. LTD., and NVIDIA
INTERNATIONAL, INC.

Defendants.

C.A. No. 19-2032-MN-CJB

JURY TRIAL DEMANDED

[PROPOSED] ORDER

At Wilmington this ____ day of _____, 2022, having reviewed Defendants' motion to compel and all of the papers submitted in support and in opposition thereto, and having conducted an oral argument,

IT IS HEREBY ORDERED that Defendant's motion is GRANTED, as follows:

- (1) ACS shall produce the documents associated with the following privilege log entries, and any other similar documents withheld on the basis of privilege, on or within 7 days of this order: D.I. 198, Ex. D, entries 173-210; Ex. E (entries 15-19); Ex. N (entries 211-241); Ex. O (entries 20-41).
- (2) ACS shall produce for a limited deposition on these documents Dean Dauger, Zvi Tannenbaum, Ariela Tannenbaum and John Bancroft, on a date mutually acceptable to the witnesses and the parties, within two weeks of this order;
- (3) ACS will produce financial documents dated 2004 to present, as requested by Defendants' RFP Nos. 137, 127-132 (D.I. 198, Ex. K.) within 7 days of this order.

UNITED STATES MAGISTRATE JUDGE